

HON. JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SUSAN LASH,

Plaintiff

v.

STANDARD INSURANCE COMPANY,

Defendant.

CASE NO. C17-1646-JLR

AGREED MOTION AND **PROPOSED**
ORDER REGARDING USE OF MODEL
STIPULATED PROTECTIVE ORDER WITH
SLIGHT MODIFICATIONS

NOTED ON MOTION CALENDAR:
June 20, 2018

AGREED MOTION

The parties, through their undersigned counsel of record, jointly move this Court to enter the Protective Order attached hereto as Dkt. No. 22-1.

The Protective Order is based on the Western District of Washington's Model Stipulated Protective Order. It has been signed by Plaintiff's counsel and by counsel for Lone Star Consulting Services, LLC d/b/a MES Peer Review Services ("MES"), and concerns documents to be produced by MES in response to a subpoena duces tecum Plaintiff served on that business. The Order has been modified slightly to reflect that it is an agreement between Plaintiff and a

AGREED MOTION AND PROPOSED ORDER RE:
USE OF MODEL PROTECTIVE ORDER - 1

No. 2:17-cv-01646-JLR

LAW OFFICE OF MEL CRAWFORD
9425 35th Avenue N.E., Suite C
Seattle, Washington 98115
Tel 206.694-1614 Fax 206.905-2342

1 non-party, rather than a party to this action. A redlined copy showing the modifications is
2 attached hereto as Dkt. No. 22-2.

3 Respectfully submitted this 20th day of June 2018.

4 LAW OFFICE OF MEL CRAWFORD

5 By s/Mel Crawford

6 Mel Crawford, WSBA # 22930
7 melcrawford@melcrawfordlaw.com
8 Attorney for Plaintiff

9 JENSEN BAKER MORSE PLLC

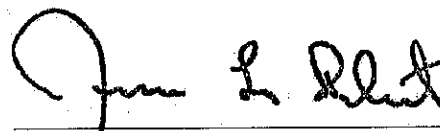
10 By

11 Gabriel Baker, WSBA No. 28473
12 gabe.baker@jmblawyers.com
13 Steven D. Jensen, WSBA No. 26495
14 steve.jensen@jmblawyers.com
15 Attorneys for Defendant

16 II. ORDER

17 Pursuant to the parties' agreed motion, it is so ORDERED. Plaintiff may file the
18 Stipulated Protective Order as that document appears at Dkt. No. 22-1.

19 Dated this 21st day of June 2018.

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21 James L. Robart
22 United States District Judge
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AGREED MOTION AND PROPOSED ORDER RE:
USE OF MODEL PROTECTIVE ORDER - 2

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CERTIFICATE OF SERVICE

I certify that on the date noted below I electronically filed this document entitled
AGREED MOTION AND PROPOSED ORDER REGARDING USE OF MODEL
STIPULATED PROTECTIVE ORDER WITH SLIGHT MODIFICATIONS with the Clerk of
the Court using the CM/ECF system which will send notification of such filing to the following
persons:

Attorneys for Defendant:

Gabriel Baker
Laura Morse
Steven D. Jensen
Jensen Morse Baker, PLLC
216 First Avenue South, Suite 204
Seattle, WA 98104

DATED this 20th day of June 2018 at Seattle, Washington.

s/Mel Crawford
Mel Crawford

AGREED MOTION AND PROPOSED ORDER RE:
USE OF MODEL PROTECTIVE ORDER - 3

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